

# **Exhibit B**

**Jackson Lewis P.C.**  
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June 24, 2024

**(VIA E-MAIL)**

Transnational

Attn: Dominic Hamden

[dominic@hamdenlaw.com](mailto:dominic@hamdenlaw.com)

Re: *Ricardo Ayala v. syncreon Technology (USA), LLC*  
United States District Court for the Eastern District of Pennsylvania  
Docket No. 2:23-cv-04561

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Dear Dominic,

Jackson Lewis P.C. represents defendant, syncreon Technology (USA), LLC (“Syncreon”), in the referenced class action wage and hour lawsuit (the “Lawsuit”) brought by Named Plaintiff Ricardo Ayala (together, the “Parties”). The Parties have reached a settlement of the Lawsuit (“Settlement Agreement”), and, on June 21, 2024, the United States District Court for the Eastern District of Pennsylvania entered an Order preliminarily approving the settlement. A copy of the Court’s Order preliminarily approving the settlement is attached hereto as **Exhibit A**.

Pursuant to the terms of the Settlement Agreement and the Court’s Order, syncreon is required to provide contact information for all temporary staffing workers who were employed by Transnational and who worked more than forty (40) hours for at least one workweek at one of three syncreon Pennsylvania facilities during the relevant dates. This information will be provided directly to the settlement administrator so that the settlement administrator may issue Notice Forms to the class members and any settlement checks to any class member who does not exclude themselves from the settlement.

To ensure compliance with the Settlement Agreement and to facilitate the timely distribution of the settlement checks, we respectfully request that you provide us with the following information for each temporary staffing worker identified in the attached **Exhibit B**.

1. **Full Name**
2. **Social Security Number**
3. **Last Known Mailing Address**
4. **Last Known Telephone Number (If Any)**
5. **Last Known E-mail (If Any)**



We understand the sensitivity of this information and assure you that it will be handled with the utmost confidentiality in compliance with the Court Order. This information will solely

be used for the purpose of issuing settlement checks as mandated by the Court. Should you require any additional information regarding the settlement, please contact me.

Please send the requested information password protected by e-mail to me by no later than June 28, 2024 to ensure that we meet the Court's deadlines. If you have any concerns about the transmission method, please contact us to discuss alternatives. We can provide a link to our secure file transfer site.

We appreciate your prompt attention to this matter. Should you have any questions or require further information, please do not hesitate to contact me.

Thank you for your cooperation.

Very truly yours,

**JACKSON LEWIS P.C.**



Margaret V. Zazulak  
Attorney At Law

/jpg  
Encl.

Cc: Rhonda James – *via email*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICARDO AYALA, on behalf of himself	:	CIVIL ACTION
and others similarly situated,	:	
<i>Plaintiff,</i>	:	
	:	
v.	:	
	:	
SYNCREON TECHNOLOGY (USA), LLC,	:	NO. 23-cv-04561
<i>Defendant.</i>	:	

**ORDER**

AND NOW, this 21st day of June 2024, upon consideration of Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and Other Related Relief (ECF No. 30) and the fully executed Class Action Settlement Agreement (ECF No. 32-1), it is hereby **ORDERED** that the Motion (ECF No. 30) is **GRANTED** and the settlement is **PRELIMINARILY APPROVED**, pursuant to Fed. R. Civ. P. 23(e).

It is **FURTHER ORDERED** as follows:

1. The Clerk of Court is directed to remove this case from **STAY**.
2. The "Notice of Settlement" form ("Notice Form") attached to the Agreement as Exhibit A and the notice protocols described in paragraph 7 of the Agreement are approved pursuant to Fed. R. Civ. P. 23(c)(2)(B). The Notice Forms shall be sent to all class members.
3. Individuals who wish to exclude themselves from the settlement must follow the procedures described in paragraph 8 of the Agreement and Section 7 of the Notice Form.
4. Individuals who wish to object to the settlement must follow the procedures described in paragraph 9 of the Agreement and Section 8 of the Notice Form.

**EXHIBIT A**

5. Winebrake & Santillo, LLC and Lichten & Liss-Riordan, P.C. are appointed interim class counsel per Fed. R. Civ. P. 23(g)(3) and shall ensure that the notice process contemplated by the Agreement is followed.
6. Pursuant to Fed. R. Civ. P. 23(e)(2), a hearing addressing final approval of the settlement is scheduled for **September 10, 2024, at 10:00 a.m.** before the Hon. Chad F. Kenney, in Courtroom 11B, 601 Market Street, Philadelphia, PA 19106. During this hearing, the Court will hear from any objectors or other class members who wish to address the Court and will hear argument from class counsel regarding, inter alia, the following issues: whether the settlement is fair and reasonable and warrants final approval under Civil Rule 23(e)(2); whether the service award described in the Agreement should be approved; and whether the attorney's fees and costs sought by class counsel should be approved under Civil Rule 23(h).
7. On or before **September 3, 2024**, class counsel shall file all papers in support of the final approval of the settlement and the associated issues described in paragraph 6 above.

**BY THE COURT:**

**/s/ Chad F. Kenney**

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**CHAD F. KENNEY, JUDGE**

Name	Agency
Autry, Andrew	Transnational
Bellinger, Dylan	Transnational
Danfora, Wendy	Transnational
Grace, Alex	Transnational
Hawkins, William	Transnational
James, Dustin	Transnational
Markel, Brian	Transnational
Ortiz, Josh	Transnational
Pegram, Stephen	Transnational
Spino, John	Transnational
Stewart, Harold	Transnational
Torres, Luis	Transnational

**EXHIBIT B**